Postal Regulatory Commission Submitted 11/14/2011 12:15:38 PM Filing ID: 77688 Accepted 11/14/2011

ROD STONE (Cal. Bar No. 145405)
JULIE KIMBALL (Cal. Bar No. 252449)
MICHAEL MENSSEN (Cal. Bar No. 273388)
BRANDON STOKER (Cal. Bar No. 277325)
KAREN MOODY (Cal. Bar No. 273178)
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue
Los Angeles, California 90071
(213) 229-7000

Attorneys for Petitioners VENICE STAKEHOLDERS ASSOCIATION and MARK RYAVEC

BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

In the matter of:

Venice Main Post Office Venice, California 90291 (Mark Ryavec and Venice Stakeholders Association, Petitioners)

Docket No. A2012-17

MOTION REQUESTING THE COMMISSION TO ACCEPT DOCUMENTS FILED UNDER A TEMPORARY FILING ONLINE ACCOUNT

Petitioners Venice Stakeholders Association and Mark Ryavec (collectively "Venice Stakeholders"), by counsel, respectfully request that the Commission accept documents filed by the Venice Stakeholders under a temporary Filing Online account. The Venice Stakeholders believe good cause exists for the Commission to accept these filings under Rule 9(e) of the Postal Regulatory Commission's Rules of Practice and Procedure, which allows documents to be filed "under temporary Filing Online accounts under extraordinary circumstances, for good cause shown."

Because of the financial limitations of the Venice Stakeholders they sought the

assistance of pro bono counsel, which they were not able to obtain until November 9,

2011. Due to the short time between obtaining pro bono counsel and the deadline for

the Initial Brief, the Venice Stakeholders are filing a motion requesting a short extension

of the deadline. In order to bring this motion before the Commission as soon as

possible, and for the convenience of all parties involved, the Venice Stakeholders filed

these motions under a temporary account, and request that the Commission accept

these filings under Rule 9(e). Counsel has already begun the process of applying for a

permanent account.

DATED: November 14, 2011

/s/ Julie Kimball

JULIE KIMBALL

Attorney for Petitioners

VENICE STAKEHOLDERS ASSOCIATION

and MARK RYAVEC

2